



**DAVID J. BRUMMOND**

Oakton, VA 22124

**DLA Piper LLP (US), *Of Counsel*, August 2014 to present.**

Provide strategic advice and guidance to U.S. and multinational clients on the impact of government initiatives on business transactions, operations and strategies, with special emphasis on state and federal initiatives impacting the insurance sector. Advise and represent clients on U.S. sanctions issues in a wide range of economic sectors, including guidance on risk-based compliance policies, procedures and training programs; filing responses to civil investigations of the Office of Foreign Assets Control (OFAC); and filing license requests with OFAC.

**US Treasury Department, 2003- 2014**

*OFAC Senior Sanctions Advisor* - July, 2006 – August 2014.

Responsibilities: promote understanding of U.S. sanctions law and compliance requirements; participate in Treasury Department, federal interagency, and intelligence community deliberations on foreign policy and national security initiatives impacting the insurance, financial services, and maritime sectors; participate in OFAC sanctions enforcement, licensing and interpretative guidance decision-making.

Accomplishments: received commendation medal from Iran Mission Manager of the Office of the Director of National Intelligence for work profiling the Iranian insurance market; provided sanctions compliance guidance in more than 80 incidents of vessel hijackings by Somali pirates; received Treasury Performance Award for analysis of U.S. sanctions implications of reinsurance and Lloyd's market coverages; played major role in drafting 2008 OFAC Enforcement Guidelines; advised OFAC on 175 insurance-related license applications and 60 insurance-related civil penalty investigations; executed 38 information-sharing MOUs between OFAC and state bank regulators; gave more than 100 outreach presentations on U.S. sanctions compliance requirements to industry, government and academic audiences.

*Legal Counsel*, Terrorism Risk Insurance Program (TRIP), 2003-2006.

Responsibilities: chief legal officer for TRIP; drafted regulations implementing the Terrorism Risk Insurance Act (TRIA); performed and supervised research and analysis of legal issues related to TRIA; represented TRIP in discussions with other federal agencies, state insurance regulators, and various private sector groups outside the Treasury; developed responses to requests for interpretative guidance for TRIA.

Accomplishments: played a major role in the drafting and publication of five final and three proposed rules implementing TRIA and 21 interpretative letters describing the Treasury's views of TRIP issues; spoke at more than 20 seminars and conferences about the TRIP Office perspective on TRIA issues; served as TRIP Office liaison to the National Association of Insurance Commissioners (NAIC) 2003-2006.

**National Fraternal Congress of America (NFCA), *General Counsel*, 1994 – 2003.**

Responsibilities: chief legal officer for trade association of 77 fraternal benefit societies ( nonprofit, membership organizations providing financial services and volunteerism opportunities for members); performed legislative and regulatory monitoring and advocacy in 50 states and at the federal level; served as legal advisor to the NFCA president, board of directors and association committees; prepared and filed *amicus curiae* briefs in federal circuit and district courts.

Accomplishments: supervised and managed lobbying activity that obtained enactment of the *NFCA 1983 Model Fraternal Code* in 15 states, including California, Massachusetts, New Jersey, New York, Ohio and Texas; led advocacy efforts on behalf of fraternal benefit societies involving risk based capital, financial reporting, policy form regulation and privacy issues before state insurance departments and the NAIC; chaired 12-person subcommittee that published a 136-page final report recommending adaptive organizational change for fraternal benefit societies in the 21<sup>st</sup> Century.

**National Association of Independent Insurers (NAII), 1983 – 1994.**Assistant Vice President & Assistant General Counsel for Legal & Policy Development, 1993 - 1994:

Responsible for policy development of all issues facing 560 members of national property/casualty insurer trade association. Supervised litigation, *amicus curiae* case involvement, and legislative database.

Assistant Vice President & Assistant General Counsel for Commercial Lines, 1989 - 1992: Responsible for policy development of all commercial lines issues. Represented member interests at NAIC, including successful advocacy of regulatory rules for reciprocal insurers.Assistant General Counsel--Legislation, 1983 - 1989: Responsible for management of legislative issues and resources related to legislative advocacy in 50 states. Managed budget and retained contract lobbyists in 40 states. Supervised three legal professionals in NAII regional offices as well as eight home office lawyers and four paralegals. Represented NAII in coalition efforts on tort reform and guaranty funds.**Miller & Daar, 1982 – 1983.**

Operated Milwaukee office of the Los Angeles law firm, Miller & Daar. Represented clients on insurance regulatory and corporate law matters, including title insurance, health insurance and antitrust compliance.

**National Association of Insurance Commissioners (NAIC), 1975 – 1982.**Acting Staff Director, 1982: Supervised multidisciplinary professional and clerical staff of 54; prepared \$5 million budget for staff operations; supervised major enhancements to internal data processing resources; prepared summary and evaluation of employee benefit package; initiated automated accounting system.Director of Governmental Liaison and Legal Services, 1979 - 1981: Prepared written testimony for insurance commissioners testifying on insurance issues in Congress; prepared and filed *amicus curiae* briefs on antitrust issues in United States Supreme Court and Circuit Courts of Appeal; monitored and reported on insurance issues at the federal level; drafted model legislation, including the NAIC Insurance Information and Privacy Protection Model Act.Counsel, 1975 - 1979: Drafted model legislation on property/casualty issues, prepared *amicus curiae* briefs, staffed NAIC committees, and monitored federal activities on insurance issues.**Education**

J. D., *with distinction*, University of Iowa, 1975

- Managing Editor, *Iowa Law Review*, 1974-75

B. A. Marquette University, 1972

**Court Admissions**

District of Columbia Court of Appeals (2014); Supreme Court of Illinois (1994); Supreme Court of Wisconsin (1981); United States Supreme Court (1978); Supreme Court of Iowa (1975).

**Organizations**

Association of Life Insurance Counsel (ALIC)

District of Columbia, Illinois, Iowa and Wisconsin bar associations.

**Selected Publications**

- *Purchasing Efficiency with Excess Surplus: A Prescription for Revitalizing the Fraternal Benefit System*, **Journal of Insurance Regulation** (Spring 2000).
- *A Reality Check on Federal Insurance Regulation*, **John Liner Review** (Winter 1993).
- *Data Reporting Laws: A Sad Tale*, **Best's Review** (September 1987).
- *Voluntary Certification under the Baucus Amendment: A Federal Charade*, **1 Journal of Insurance Regulation** 308 (March 1983).
- *A Response to Criticism of the NAIC Model Privacy Act*, **Best's Review** (May 1980).
- *The Legal Status of Uninsured, Noncollectively-Bargained Multiple-Employer Welfare Trusts under ERISA and State Insurance Laws*, **28 Syracuse Law Review** 701 (1977).
- *Federal Preemption of State Insurance Regulations under ERISA*, **62 Iowa Law Review** 57 (1976).